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EXHIBIT C

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311 E. LIBERTY STREET
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DAVID@OMARALAW.NET

April 28, 2022

VIA EMAIL MURCHPJ@NV.CCSD.NET
ORIGINAL VIA U.S. MAIL

Patrick J. Murch
Assistant General Counsel
Clark County School District
5100 West Sahara Avenue
Las Vegas, NV 89146

**Re: Bullying Of ECTA Past President And Current Vice-President Of Students
For Life Club And Ongoing Discrimination Against ECTA Students For Life
Club**

Dear Mr. Murch:

Thank you for your March 24, 2022 response to our letter on behalf of the ECTA Students for Life group and Mr. Avila. In order that we have a better understanding of the District's position, could you please provide clarification regarding the following:

- The written guidelines governing the content of student organization banners including the criteria used by school administrators in determining whether student organization banners "benefit all students."
- I note that last week, our client was provided the attached single page (page 11) as embodying the rules governing flyers and banners. Those "rules" appear to be part of a multi-page document. We have been unable to locate that document on the District's website or on ECTA's website. Could you provide us with a copy of the entire document?
- The written guidelines governing the content of student organization flyers. In your response you indicate that flyers that constitute advertisements or promotions for "outside organizations" are impermissible, but that flyers promoting student organization fundraisers to benefit outside organizations are permissible. You also indicate, each student organization is limited to "one approved flyer per meeting or event, containing the time, place, location of their meetings, and who is invited to attend." I assume those rules are embodied in writing - could you provide me with a copy? Also, is it the District's position that different criteria govern banners and flyers?

As I am sure you are aware, the District's policies (Policy R-5132) state, in relevant part, "Noncurriculum-related student groups and individual members of those student groups may

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distribute materials in conformance with District Regulation 1110." District Regulation 1110 provides, in relevant part: "Such distribution shall be limited to those materials that will directly benefit the educational program of a school or of the Clark County School District." As requested above, please provide a copy of the criteria the District uses to determine whether materials "will directly benefit the educational program of a school or the Clark County School District."

I would also note that District Regulation 1110 requires the principal to review materials submitted for distribution on a school wide basis within three days of the request and, if the request is denied, to specify the reasons for the denial in writing. (District Regulation 1110 II.A.3). As far as I am able to determine, the ECTA Students For Life Club has never received any written statement denying distribution or a statement of the reasons for denials. Such decisions have been verbal only. In fact, Mr. Avila has been regularly removed from class so that the ECTA principal or ECTA assistant principal may issue verbal denials, typically with no explanation for the denial. This interruption of Mr. Avila's instructional time must cease and, in compliance with the District's policy, we request that all further rulings on requests to distribute materials (in the form of banners, posted flyers, etc.) be issued in writing within three days, with a written statement of the reasons therefore.

Mr. Avila is currently awaiting a response regarding his request relating to the attached flyer, that was submitted for approval on April 21, 2022.

Also, I understand that you have requested that Mr. Avila discontinue copying you on the Students For Life Club's ongoing attempts to obtain approval for its various displays and activities. I assume you are concerned about direct communications with a person represented by counsel. Accordingly, I will myself forward you copies of such emails, which, I'm sure you will agree, is important in view of the apparent discrepancies in understanding as to what has and has not been requested by the ECTA Students For Life Club and the responses to those requests by the ECTA administration.

We would appreciate your formal written response no later than May 4, 2022.

Very truly yours,


David C. O'Mara, Esq.

Enclosures

cc: Office for a Safe and Respectful Learning Environment
Christy McGill, Director
cmcgill@doe.nv.gov

3. All stories must be submitted by 6:00 am in order to be included in the day's newscast.
4. EVTV will edit the announcement to ensure the use of journalistic writing under Video Production Standards.
5. Announcements will be played a maximum of five days.

B. Flyers, Posters, Banners

1. All flyers, posters, and banners (other than classroom student work) must be approved (with an approval stamp) through the Student Activities Office before they are posted. As every sign must have the stamp, an original copy should be made and stamped for approval prior to copies being made.
2. All signs must be dated in the bottom right corner. Signs can be posted for a maximum of 2 weeks. All materials posted must be taken down on the last day of the activity. This includes materials used to hang the sign.
3. Masking tape should be used to hang the signs – no clear tape, duct tape, or staples.
4. Items may be posted on walls or empty/designated bulletin boards. They are not to be posted on glass windows or doors. No banners will be hung in the cafeteria unless the message benefits all students.
5. No signs advertising for any outside agency that is not of an educational nature will be approved.
6. Items not conforming to any of the above requirements will be removed immediately.

C. Bulletin Boards

1. Each club/organization will be assigned a bulletin board in close proximity to the advisor's classroom to be used to post club information.
2. The bulletin board should be kept updated and neat.
3. Bulletin boards must be cleared at the end of every school year.

VII. FUNDRAISING

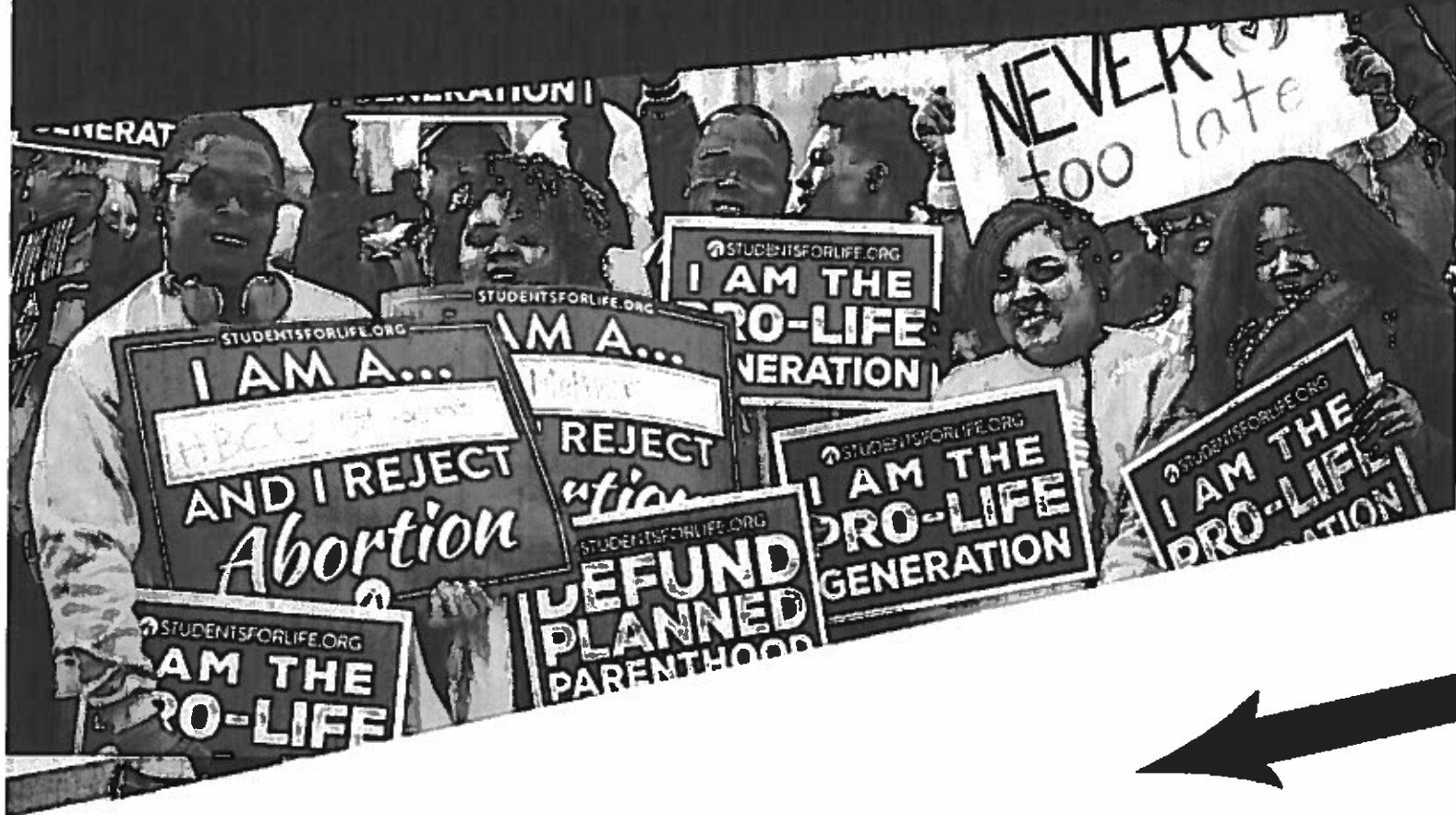
A. Approval

1. Fundraiser Request/Reports are available in the Student Activities Office and must be completed for all fundraisers, whether on or off campus. The form must be completed, signed by the advisor, and submitted to the administrator in charge of Student Activities for approval. Once approved, the advisor will receive notification of the approval/denial of the fundraiser request.
2. Any group proceeding with a fundraising activity without receiving approval will be forced to close down the activity until the proper procedures are followed. Money raised for a fundraiser that has not been approved will go to the school's general fund.
3. The financial existence of clubs and organizations depends almost entirely on student-generated funds; however, no fundraising will be permitted to interfere with any instructional activity.
4. No club, organization, student, or advisor should order anything, attempt to sell anything, solicit anything, or attempt to provide any service for money without the express written consent of the administrator in charge of Student Activities.
5. Students may not participate in activities to raise funds without the express written consent of the advisor and approval by the Student Activities Office.
6. Raffles (gambling) are NOT permitted.

B. Use of Funds

1. Fundraising money must be used for the benefit of the students who raised the funds or as directed by them with the approval of the administrator in charge of Student Activities and the advisor.

PRO-LIFE STUDENTS,
IT'S TIME TO
Meet Up!



TOPIC: Reaching a Pro-Life Future

WHEN: April 26th @ 1:30 PM

WHERE: Room 301, All Are Welcome

SPONSORED BY: ECTA Students for Life